

From: Hilgenberg, Scott (DNR)
Sent: Friday, April 18, 2014 10:46 AM
To: EFSEC (UTC)
Subject: DNR Comment on Energy Northwest's NPDES Permit WA-002515-1
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Hello Jim La Spina:

Please find attached to this e-mail Washington State Department of Natural Resources Aquatic Resources Division's comment on the renewal of Energy Northwest's NPDES permit. Please contact me if there are any outstanding issues regarding the submission of this comment.

Best regards,

Scott Hilgenberg
Land Manager- Easement Specialist
Aquatic Resources Division / Rivers District
Washington State Department of Natural Resources
360-740-6807
Scott.Hilgenberg@dnr.wa.gov
www.dnr.wa.gov



April 18, 2014

Jim La Spina
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172
efsec@utc.wa.gov

SUBJECT: DNR Comment on NPDES Permit No. WA-002515-1

Dear Mr. La Spina:

Thank you for the opportunity to comment on the renewal of Energy Northwest's NPDES permit No. WA-002515-1. The Washington State Department of Natural Resources Aquatic Resources Division ("DNR") has two substantive requests: the agency requests that Energy Northwest provides a report to DNR on its strategy for reducing discharges and that the NPDES permit includes sediment sampling. Due to the types of activities and chemicals that exist at this facility, DNR is concerned about the quality of sediment near the site. Identification and awareness of sediment quality issues are prudent for DNR to effectively manage State-owned aquatic lands ("SOAL").

DNR manages over 2.4 million acres of SOAL. DNR's management obligation covers bedlands, shorelands, tidelands and lands within harbor areas; aquatic plants, aquatic animals, and valuable materials and minerals.

DNR's management authority is derived from the Washington State Constitution (Article XV, XVII, XXVII); Revised Code of Washington 79.01, 79.90 to 79.100; and Washington Administrative Code WAC 332-30. As the proprietary manager of SOAL, DNR is directed by RCW 79.90.455 to manage the land "for the benefit of the public" in a manner that provides "a balance of public benefits for all citizens of the State," which includes:

- 1) Encouraging direct public use and access;
- 2) Fostering water-dependent use and access;
- 3) Ensuring environmental protection; and
- 4) Utilizing renewable resources.

In response to the renewal of Energy Northwest's NPDES permit no. WA-002515-1, DNR submits this comment in order to ensure protection of the public's interest in SOAL.

Mr. Jim Spina
April 18, 2014
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Report on Discharge Reduction

In 2005, DNR and Energy Northwest entered into a 30-year easement agreement that authorizes the outfall under DNR agreement #51-076659. Within this agreement, Energy Northwest acknowledges the State's goal to reduce reliance on the receiving waters of Washington State for the disposal of waste water and other discharges. In addition, Energy Northwest is obligated to submit a written report to DNR at the time of application for a renewal of a NPDES permit. That report should identify:

- 1) Activities undertaken since the previous report to reduce discharges that supports efforts to decrease chemical, biological and physical impacts to SOAL and their associated biological communities; and
- 2) Current and future plans, including funding, for reducing discharges and decreasing chemical, biological and physical impacts to SOAL and their associated biological communities.

In light of the NPDES permit renewal, DNR requests that Energy Northwest submit a brief report to DNR regarding its progress in reducing its discharges.

Sediment Sampling Requirement in the NPDES Permit

In addition, DNR would like to see sediment sampling as a requirement within the NPDES permit. DNR is particularly concerned about the sediment around the point of discharge. DNR suggests required sediment sampling that includes sampling for the suite of conventional contaminants, as well as metals and organic compounds per WAC 173-204-563. In addition, radiological contaminants of concern, strontium-90, gamma emitting radionuclides (potassium-40, cobalt-60, cesium-137), europium, uranium and plutonium should all be sampled for per subsection (4) of WAC 173-204-563. If sediment sampling becomes a requirement of the NPDES permit, DNR encourages Energy Northwest to submit a sampling and analysis plan for review by DNR's Sediment Quality Unit. Please note that any in-water testing would require a separate right-of-entry agreement with DNR.

If you have any questions, please contact DNR-Aquatics Easement Specialist Scott Hilgenberg at (360) 740-6807 or via email at scott.hilgenberg@dnr.wa.gov.

Best regards,



Scott Hilgenberg, Easement Specialist
Aquatic Resources Division, Rivers District